

# EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE MIDDLE DISTRICT OF TENNESSEE  
3 NASHVILLE DIVISION

4 CHRISTIE ANDREWS, )  
5 )  
6 Plaintiff, )  
7 )  
8 vs. ) CASE NO.  
9 ) 3:21-cv-00526  
10 TRI STAR SPORTS AND )  
11 ENTERTAINMENT GROUP, INC., )  
12 )  
13 Defendant. )  
14 \_\_\_\_\_ )

15 VIDEOTAPED DEPOSITION OF:

16 LOU TAYLOR

17 Taken on behalf of the Plaintiff

18 August 24, 2022  
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1 APPEARANCES:

2 For the Plaintiff:

3 **DANIEL ARCINIEGAS, ESQ.**  
4 Arciniegas Law  
1242 Old Hillsboro Road  
The Atrium Building  
5 Franklin, Tennessee 37069-9129  
629.777.5339  
6 Daniel@attorneydaniel.com

7 For the Defendants:

8 TARA SWAFFORD, ESQ.  
9 ELIZABETH "BETSY" HART  
The Swafford Law Firm, PLLC  
321 Billingsly Court  
10 Suite 19  
Franklin, Tennessee 37067  
11 615.599.8406  
Betsy@swaffordlawfirm.com  
12 Tara@swaffordlawfirm.com

13 Also Present:

14 Peggy Stephens  
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1 Q. Expenditure.

2 Was there any, like, preferential  
3 considerations during that process?

4 A. The essential staff with  
5 preferential treatment were defined in three  
6 categories: Single parents or parents who had  
7 childcare needs, people who live with first  
8 responders. I can't remember the third one. Let  
9 me see. Give me a minute. Childcare needs,  
10 people -- oh, who were immune compromised.

11 Q. So when you had these three  
12 categories of --

13 A. Uh-huh.

14 Q. -- preferential treat- --  
15 consideration --

16 A. Essential staff, uh-huh.

17 Q. Okay. So within the essential  
18 staff, you have these preferential considerations.  
19 You have these three categories, correct?

20 A. (No audible response.)

21 Q. And was -- you gave them in  
22 order, but how -- they're -- that's not in the  
23 order of ranking of importance or weight, right?

24 A. No. That's right.

25 Q. Okay. Were they treated equally,

1           A.       Team coordinators. I went  
2 through that already.

3           Q.       Okay. Do they -- are they  
4 primary contact points for clients or not?

5           A.       Sometimes and sometimes not.

6           Q.       Okay. So some client -- or what  
7 do we call them, team coordinators --

8           A.       That's right.

9           Q.       -- would have established  
10 relationships with their book of business; is that  
11 fair?

12          A.       They don't have a book of  
13 business. They support the team. But yes, they  
14 would have communication with client staff,  
15 sometimes clients, trusted advisors.

16          Q.       Right.

17          A.       Uh-huh.

18          Q.       And some -- some clients -- and  
19 you -- well, let me -- let's kind of establish  
20 something. You have the main client, and then  
21 they have employees that may communicate to your  
22 business for their services?

23          A.       That's correct.

24          Q.       And so various levels of people  
25 may be coming to y'all to address a client's

1 issues; is that fair?

2 A. That's correct.

3 Q. And so they -- over time, they  
4 develop a certain rapport with certain individuals  
5 within your organization; is that fair?

6 A. That's correct.

7 Q. And then -- so some people may be  
8 more comfortable calling a team coordinator as  
9 opposed to the business manager?

10 A. Probably not, but --

11 Q. Okay.

12 A. -- maybe.

13 Q. Maybe?

14 A. Depending on what it is.

15 Q. Right.

16 A. Yeah.

17 Q. Like --

18 A. They're not going to call a team  
19 coordinator and talk about contract servicing or  
20 taxes, you know. They're going to call the team  
21 coordinator and go: My license plate didn't show  
22 up.

23 Q. Right.

24 A. The dog walker didn't show up.

25 That's what they're going to call the team

1 LogMeIn, Citrix, one of those. I can't remember.

2 Q. Okay. And so, generally, most  
3 employees at the time, did they desktops; is that  
4 what they're --

5 A. Yeah.

6 Q. Okay.

7 A. Uh-huh.

8 Q. But a certain subset of the  
9 employees had laptops; fair?

10 A. Yeah, small. I -- I -- I don't  
11 know how many. I didn't issue the computers.

12 Q. Okay. And can you think of a  
13 reason why a team coordinator would be issued a  
14 laptop?

15 A. Only in an instance where  
16 somebody needed to log in over the weekend or to  
17 reset, you know, a password for something. I -- I  
18 don't know.

19 Q. So there's a job position or  
20 title that's being attributed to my client, AMEX  
21 liaison.

22 A. Uh-huh.

23 Q. What is your understanding of  
24 that position?

25 A. I think at that point in time,



1 Christie, you know, was the liaison. So instead  
2 of having everything within the team hitting VIP  
3 Services at AMEX, Christie would open/close cards  
4 and talk to whoever that service representative  
5 was.

6 Q. Okay. And that would not be  
7 limited to -- that would be firm-wide; is that  
8 fair?

9 A. I believe it was firm-wide,  
10 uh-huh.

11 Q. Okay. Is there a job -- is there  
12 an actual, like, written job description for that?

13 A. For the AMEX liaison? I don't  
14 know.

15 Q. Who would know that answer?

16 A. Somebody in HR.

17 Q. Okay. Before Christie was AMEX  
18 liaison, do you -- did you have anybody else  
19 working as an AMEX liaison?

20 A. I don't believe so.

21 Q. And the AMEX liaison would be  
22 responsible for, you know, those credit card  
23 questions for -- for a client's employee as well,  
24 right, if it's a business credit card?

25 A. I don't know if it was so much



1 questions. I think she did the administrative  
2 function of opening the cards, closing them,  
3 reset. You know, I -- I -- I really don't know  
4 what the detail was.

5 Q. Okay. But you were involved with  
6 the decision to establish somebody as the  
7 designated AMEX liaison?

8 A. I don't know if I was.

9 Q. Okay.

10 A. That doesn't sound like something  
11 I'd be involved in.

12 Q. Okay. So without getting into  
13 the details of the tech, you guys have your own  
14 servers?

15 A. We do.

16 Q. And you can control the level of  
17 access an individual can have to those serve --

18 A. I -- you are talking to the most  
19 tech-challenged person in the organization, so  
20 good luck with this line of questioning.

21 Q. Yeah.

22 A. Have at it. How long we going to  
23 spend doing it, because it's going to be a short  
24 section.

25 Q. We can skip right over it.

1 here: "Just so you know, Christie has a laptop in  
2 the office. It is not in her home, so we could  
3 get that set up straight away. Christie has been  
4 asking for answers" --

5 A. Uh-huh.

6 Q. -- "so thank you for being  
7 sensitive to the timing."

8 A. Instead.

9 Q. What did you understand -- did  
10 you have have a conversation with him about this?

11 A. I do not.

12 Q. What did you understand him to be  
13 saying when he wrote this?

14 A. That she had a laptop with her  
15 and that she could work from home, and that he  
16 wanted me to give consideration to her.

17 Q. So he's asking for some  
18 preferential consideration?

19 A. That's right.

20 Q. Okay. Now, if you turn to the  
21 136.

22 A. Uh-huh.

23 Q. So there's a work-from-home  
24 paperwork that --

25 A. Uh-huh.

1 advisors or the clients. It is -- it's a  
2 communications position.

3 Q. Right. And communications  
4 position involved both offices; fair?

5 A. Uh-huh, it did.

6 Q. So people could communicate from  
7 -- with the West office and the East office?

8 A. That's right.

9 Q. Using e-mail and telephones,  
10 right?

11 A. It's not dividing the teams, and  
12 that's not your decision to make. It is my  
13 decision --

14 Q. I agree.

15 A. -- as a firm that the information  
16 for the clients would be in the firm, and either  
17 you were working and supporting the team or you  
18 were not.

19 Q. Okay.

20 A. That is a decision as a business  
21 owner in America that I get to make.

22 Q. And for -- for certain categories  
23 of individuals, you took into account whether they  
24 had an immune system issue; fair?

25 A. Uh-huh.

1 Q. Correct?

2 A. Yeah, that's correct.

3 Q. Okay. Did you understand that to  
4 be an obligation under the law?

5 A. I did not.

6 Q. Okay. Is it your basic  
7 understanding not to take into -- or is it your  
8 basic understanding that -- well, let's go back.

9 Earlier, we talked about the  
10 interactive process, right?

11 A. Uh-huh.

12 Q. You understood that?

13 A. I do.

14 Q. And your understanding is if  
15 somebody brings up a health issue, then there's  
16 supposed to be this dialogue; is that fair?

17 A. That's correct.

18 Q. It's not a dialogue that you  
19 specifically engage in, but you expected people in  
20 your employ --

21 A. Uh-huh.

22 Q. -- primarily the HR people to --

23 A. That's right.

24 Q. -- engaged in that dialogue; is  
25 that fair?